

FILED

AUG 17 2021

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Case No. **21 CR356 CVE**

Plaintiff,

v.

**WILLIAM COLBY COX,
LAURA KAY SAWYER,**

Defendants.

INDICTMENT

**[COUNTS ONE and TWO: 18
U.S.C. §§ 922(g)(1) and 924(a)(2) –
Felon in Possession of a Firearm
and Ammunition;
COUNT THREE: 21 U.S.C. §§ 846
and 841(b)(1)(B)(viii) – Drug
Conspiracy;
COUNT FOUR: 21 U.S.C. §§
841(a)(1) and 841(b)(1)(B)(viii), and
18 U.S.C. § 2 – Possession of
Methamphetamine with Intent to
Distribute;
COUNT FIVE: 18 U.S.C.
§§ 924(c)(1)(A)(i) and 2 – Possession
of a Firearm in Furtherance of a
Drug Trafficking Crime;
COUNT SIX: 21 U.S.C. §§
856(a)(1) and 856(b), and 18 U.S.C.
§ 2 – Maintaining a Drug-Involved
Premises;
Forfeiture Allegation: 18 U.S.C.
§ 924(d), 21 U.S.C. § 853, 28
U.S.C. § 2461(c) – Drug and
Firearms Forfeiture]**

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. §§ 922(g)(1) and 924(a)(2)]

On or about July 29, 2021, in the Northern District of Oklahoma, the defendant,
WILLIAM COLBY COX, knowing he had previously been convicted of the
following crimes punishable by imprisonment for terms exceeding one year:

1. Assault, Second Degree; Case No. 03CR18394001, in Lafayette County Circuit Court, State of Missouri, on July 21, 2003;
2. Possession of a Prohibited Firearm; Case No. 03-CR-00229, in the United States District Court for the Western District of Missouri, on September 10, 2003;
3. Assault and Battery with a Dangerous Weapon; Case No. CF-2008-00014, in the District Court of Murray County, State of Oklahoma, on March 6, 2009;
4. Endangering Others While Eluding Peace Officer; Case No. CF-2016-00030, in the District Court of Garvin County, State of Oklahoma, on January 2, 2018;
5. Possession of Controlled Dangerous Substance; Case No. CF-2016-00148, in the District Court of Murray County, State of Oklahoma, on August 18, 2017;
6. Aggravated Assault and Battery; Case No. CF-2016-00260, in the District Court of Murray County, State of Oklahoma, on August 18, 2017

knowingly possessed in and affecting interstate commerce the following firearms and ammunition:

1. A FEG, Model PA-63 9-millimeter pistol, serial number AJ3144;
2. A Rohm GMBH, Model RG26, .25 caliber pistol, serial number U029476;
3. An Intratec, Model AB-10, 9-millimeter pistol, serial number A045004;
4. A Rohm GMBH, .22 caliber revolver, serial number 75435;
5. A Lorcin, Model L380, .380 caliber pistol, serial number 321453;
6. A Taurus Inc., Model PT-22, .22 caliber pistol, serial number 84437Z;
7. 60 rounds of 9-millimeter ammunition;
8. 13 rounds of .22 caliber ammunition;
9. 4 rounds of .25 caliber ammunition;
10. 9 rounds of .380 caliber ammunition; and

11. Numerous other rounds of assorted ammunition.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT TWO
[18 U.S.C. §§ 922(g)(1) and 924(a)(2)]

On or about July 29, 2021, in the Northern District of Oklahoma, the defendant, **LAURA KAY SAWYER**, knowing she had previously been convicted of the following crimes punishable by imprisonment for terms exceeding one year:

Unlawful Possession of Controlled Drug – Methamphetamine; Case No. CF-2012-3454, in the District Court of Tulsa County, State of Oklahoma, on July 3, 2013;

knowingly possessed in and affecting interstate commerce the following firearms and ammunition:

1. A FEG, Model PA-63 9-millimeter pistol, serial number AJ3144;
2. A Rohm GMBH, Model RG26, .25 caliber pistol, serial number U029476;
3. An Intratec, Model AB-10, 9-millimeter pistol, serial number A045004;
4. A Rohm GMBH, .22 caliber revolver, serial number 75435;
5. A Lorcin, Model L380, .380 caliber pistol, serial number 321453;
6. A Taurus Inc., Model PT-22, .22 caliber pistol, serial number 84437Z;
7. 60 rounds of 9-millimeter ammunition;
8. 13 rounds of .22 caliber ammunition;
9. 4 rounds of .25 caliber ammunition;
10. 9 rounds of .380 caliber ammunition; and
11. Numerous other rounds of assorted ammunition.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT THREE
[21 U.S.C. §§ 846 and 841(b)(1)(B)(viii)]

On or about July 29, 2021, in the Northern District of Oklahoma, the defendants, **WILLIAM COLBY COX** and **LAURA KAY SAWYER**, knowingly, intentionally, and willfully conspired, confederated, and agreed, together and with others known and unknown to the Grand Jury, to commit offenses against the United States, including:

To possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(B)(viii).

COUNT FOUR

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii), and 18 U.S.C. § 2]

On or about July 29, 2021, in the Northern District of Oklahoma, the defendants, **WILLIAM COLBY COX** and **LAURA KAY SAWYER**, aiding and abetting each other, knowingly and intentionally possessed with the intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii), and Title 18, United States Code, Section 2.

COUNT FIVE
[18 U.S.C. §§ 924(c)(1)(A)(i) and 2]

On or about July 29, 2021, in the Northern District of Oklahoma, the defendants, **WILLIAM COLBY COX** and **LAURA KAY SAWYER**, aiding and abetting each other, knowingly possessed firearms, a FEG, Model PA-63 9-millimeter pistol, serial number AJ3144; a Rohm GMBH, Model RG26, .25 caliber pistol, serial number U029476; an Intratec, Model AB-10, 9-millimeter pistol, serial number A045004; a Rohm GMBH, .22 caliber revolver, serial number 75435; a Lorcin, Model L380, .380 caliber pistol, serial number 321453; and a Taurus Inc., Model PT-22, .22 caliber pistol, serial number 84437Z, in furtherance of drug trafficking crimes for which they may be prosecuted in a court of the United States, that is, Drug Conspiracy, as set forth more fully in Count Three of this Indictment, and Possession of Methamphetamine with Intent to Distribute, as set forth more fully in Count Four of this Indictment.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

COUNT SIX
[21 U.S.C. §§ 856(a)(1) and 856(b), and 18 U.S.C. § 2]

On or about July 29, 2021, in the Northern District of Oklahoma, the defendants, **WILLIAM COLBY COX** and **LAURA KAY SAWYER**, aiding and abetting each other, unlawfully and knowingly used and maintained a place located at 4536 South Xenophon Avenue, Tulsa, Oklahoma, for the purpose of distributing methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 856(a)(1) and 856(b), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION
[18 U.S.C. § 924(d), 21 U.S.C. § 853, 28 U.S.C. § 2461(c)]

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses alleged in this Indictment, as a part of their sentences, the defendants, **WILLIAM COLBY COX** and **LAURA KAY SAWYER**, shall forfeit to the United States, any property constituting, or derived from, or traceable to, the proceeds obtained, directly or indirectly, as a result of such violations, any firearm and ammunition involved in or used in the knowing commission of such offenses, and any property, real or personal, that was used or intended to be used to commit or to facilitate the violation of federal law. The property to be forfeited includes, but is not limited to:

MONEY JUDGMENT

1. A money judgment in an amount representing proceeds obtained by Defendant **WILLIAM COLBY COX** as a result of the offenses;

FIREARMS AND AMMUNITION

2. A FEG, Model PA-63 9-millimeter pistol, serial number AJ3144;
3. A Rohm GMBH, Model RG26, .25 caliber pistol, serial number U029476;
4. An Intratec, Model AB-10, 9-millimeter pistol, serial number A045004;
5. A Rohm GMBH, .22 caliber revolver, serial number 75435;

6. A Lorcin, Model L380, .380 caliber pistol, serial number 321453;
7. A Taurus Inc., Model PT-22, .22 caliber pistol, serial number 84437Z;
8. 86 rounds of miscellaneous caliber ammunition;
9. A green ammunition can containing approximately 400 rounds of assorted caliber and brand ammunition; and

CURRENCY

10. \$3,000 in United States currency.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1028(g), and Title 28, United States Code, Section 2461(c), the defendant shall forfeit substitute property, up to the value of the property described above if, by any act or omission of the defendant, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c).

CLINTON J. JOHNSON
Acting United States Attorney

A TRUE BILL



DAVID A. NASAR
Assistant United States Attorney

/s/ Grand Jury Foreperson
Grand Jury Foreperson